

IN THE MATTER OF SALARY ARBITRATION BETWEEN:

LARS ELLER

- AND -

THE MONTREAL CANADIENS

BRIEF OF THE MONTREAL CANADIENS

[TEAM #29](#)

## **Introduction**

Pursuant to section 12.9 of the NHL Collective Bargaining Agreement,<sup>5</sup> this brief will outline why Lars Eller should be awarded less than the midpoint salary of \$3.5 million. Instead we submit that he should be awarded \$2.75 million. Lars Eller is a third line center with limited offensive production in his platform year and whose defensive play is not strong enough to justify a \$3.5 million midpoint salary. By assessing his platform year and career performance in relation to relevant comparable players, we believe the appropriate salary for Mr. Eller is \$2.75 million.

## **Lars Eller's Career and Platform Year Performance**

Through his time in Montreal, Lars Eller has established himself as the third line center for the Canadiens. Over the last three years, his time on the ice remained within a minute of his platform year performance of 15:57.<sup>6</sup> Over the last three years, his highest time on the ice at even strength is 13:26 and his low is 12:39. Additionally, he has never averaged more than 2:30 on the ice per game on special teams. In his platform year, he was not one of the top five penalty killing forwards, nor was he one of the top eight forwards for power play ice time. Each of the last three seasons Mr. Eller has been the third highest center in terms of time on ice for his team, behind Tomas Plekanec and David Desharnais.

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<sup>5</sup> NHL Collective Bargaining Agreement, 2005, s.12.

<sup>6</sup> All statistics cited in this brief are available at [www.NHL.com](http://www.NHL.com)

### Mr. Eller's 3 Year to Platform Time on Ice Statistics

	Total Time on Ice per Game	Even Strength Time on Ice Per Game	Shorthanded Time on Ice Per Game	Powerplay Time on Ice per Game	Rank Amongst Centers on the Team in Time on Ice
2011-2012	15:18	12:57	1:41	0:39	3rd
2012-2013	14:49	12:39	1:28	0:42	3rd
2013-2014	15:57	13:26	1:24	1:06	3rd

In his platform year Mr. Eller played 77 games during which he scored 12 goals and 14 assists for a total of 26 points. This works out to a platform goals per game of 0.16 and points per game of 0.34. Each of these numbers is at or below Mr. Eller's career to platform performance of 0.16 goals per game and 0.36 points per game.

### Mr. Eller's Platform Season Offensive Production

Games Played	Goals	Assists	Points	Platform Goals per Game	Platform Points per Game	Career to Platform Goals per Game	Career to Platform Points per Game
77	12	14	26	0.16	0.34	0.16	0.36

On the defensive side of play, Mr. Eller's production was mixed. He was a -15. This placed him worst on his team amongst forwards who played more than half of the team's game. This statistic stands against any contention that Mr. Eller excels as a defensive player. We acknowledge that some of his other statistics are stronger than his plus minus, specifically his blocked shots and

hits, but that does not make up for him being the worst on his team in plus minus. Additionally, his minimal shorthanded time on ice in his platform year also illustrates the suspect nature of his defensive play.

<b>Platform Plus Minus</b>	<b>Rank in Forwards' Plus Minus</b>	<b>Blocked Shots</b>	<b>Hits</b>	<b>Takeaways</b>	<b>Shorthanded Time on Ice per Game (rank amongst forwards)</b>
-15	13th (of 13)	58	130	30	1:24 (6th)

### **Mr. Eller's Platform Season Defensive Production**

#### **Filters for Comparable Players**

Only players who meet the following two criteria, in relation to Mr. Eller, were considered as comparables:

- 1) Career games played: +/- 150 games
- 2) Career points per game: +/- 25%

First, we looked at players who played within 150 career games of Mr. Eller to ensure that the players being compared are at a similar stage in their career. Next we looked at players who have over the course of their career produced a similar amount of points per game. In this case, using a range of 25% allows for consideration of players who have recorded between 0.27 points per game and 0.45 points per game over their career to platform years. Based on these filters, we are left with the following four comparable players for Mr. Eller: Michael Frolik, Josh Bailey, Nick Spaling and Dwight King.



### **Mr. Eller compared to Michael Frolik and Josh Bailey**

Michael Frolik's platform season was 2013-2014. Following this season he re-signed with the Winnipeg Jets to a one year deal for \$3.3 million.<sup>7</sup> Josh Bailey's platform season was 2012-2013 and following this season he signed a five year contract with the New York Islanders worth \$16.5 million. For comparison purposes, his salary is \$3.3 million.<sup>8</sup>

Michael Frolik and Josh Bailey, we submit, are ceiling comparables for Mr. Eller; he should therefore be awarded no more than the \$3.3 million they make. Based on their platform year performance and their overall career performance, these two player's production exceeds that of Mr. Eller and therefore he should be awarded a salary lower than what they received following their platform seasons.

In comparing Mr. Frolik and Mr. Bailey to Mr. Eller we begin by looking at the platform year offensive production of these two players. Both Mr. Frolik and Mr. Bailey averaged over half a point per game which is higher than Mr. Eller's 0.34 points per game. Additionally they each have higher platform goals per game, especially Mr. Bailey who recorded 0.29 goals per game in his platform year. Similar to Mr. Eller, both of these players are primarily third line players and their time on ice relative to the other forwards on their team reflects this.

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<sup>7</sup> <http://capgeek.com/player/816>

<sup>8</sup> <http://capgeek.com/player/1084>

### Offensive Statistics of Mr. Eller, Mr. Frolik and Mr. Bailey

	Games Played	Platform Goals per Game	Platform Points per Game	Career Goals per Game	Career Points per Game	Platform Time on Ice per Game	Rank in Forwards' Time on Ice per Game
<b>Lars Eller</b>	77	0.16	0.34	0.16	0.36	15:57	6th
<b>Michael Frolik</b>	81	0.19	0.52	0.18	0.45	16:40	7th
<b>Josh Bailey</b>	38 (in a 48 game season)	0.29	0.50	0.18	0.42	16:22	6th

On the defensive side of the game, the plus minus rating in the platform seasons of Mr. Frolik and Mr. Bailey far exceeds that of Mr. Eller. When the plus minus is looked at in comparison to the other forwards on the team the difference is even more pronounced. While Mr. Bailey has the highest plus minus on his team and Mr. Frolik has the fourth highest, Mr. Eller has the worst minus rating on his team.

### Platform Year Defensive Statistics of Mr. Eller, Mr. Frolik and Mr. Bailey

	Platform Plus / Minus	Rank in Forwards' Plus / Minus	Blocked Shots	Hits	Takeaways	Shorthanded Time on Ice per Game (rank amongst forwards)
<b>Lars Eller</b>	-15	13th (of 13)	58	130	30	1:24 (6th)
<b>Michael Frolik</b>	+8	4th (of 13)	51	41	53	1:18 (6th)
<b>Josh Bailey</b>	+7	1st (of 12)	22	24	26	0:54 (5th)

Based on their performances in their platform years we contend that Mr. Eller falls short of Mr. Frolik and Mr. Bailey in both offensive and defensive facets of the game. Therefore we submit that Mr. Eller should not be awarded a salary as high as Mr. Frolik and Mr. Bailey at \$3.3 million. There is nothing that would warrant an award higher than \$3.3 million as the midpoint salary of \$3.5 million would be.

### **Mr. Eller compared to Dwight King and Nick Spaling**

Nick Spaling's platform season was 2013-2014 and following this season he signed a two year \$4.4 million contract. For comparison purposes, his annual salary is \$2.2 million.<sup>9</sup> Dwight King's platform season was 2013-2014 following that season he signed a three year \$5.85 million contract with the Los Angeles, giving him a comparable annual salary of \$1.95 million.<sup>10</sup>

Mr. King and Mr. Spaling represent the floor for what Mr. Eller's award should be. As will be outlined these two players have some favourable statistical comparisons, especially offensive production, in relation to Mr. Eller. However, on the whole they are inferior players and therefore we submit that Mr. Eller should make more than Mr. Spaling's \$2.2m salary, but not significantly more.

Looking at the three players' platform year production, both Mr. Spaling and Mr. King had superior production to Mr. Eller at the offensive end. Mr. Spaling had 0.18 platform goals per

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<sup>9</sup> <http://capgeek.com/player/1073>

<sup>10</sup> <http://capgeek.com/player/1375>



game and Mr. King had 0.19 goals per game. Similarly, for platform year points per game they also outperformed Mr. Eller. Mr. Spaling recorded 0.45 points per game and Mr. King recorded 0.39 points per game compared against Mr. Eller's 0.34. Looking beyond that one season to their career to platform statistics, Mr. Eller does have higher production both in career to platform goals per game and points per game. However for career to platform points per game the difference is not stark - it is only 0.08 points per game higher than Mr. Spaling and .02 points per game higher than Mr. King. Neither of these are a significant enough margin to say that Mr. Eller is far superior than these two comparable players sufficient to warrant a salary of over \$1 million per season more than them.

#### **Platform Year Offensive Statistics of Mr. Eller, Mr. King and Mr. Spaling**

	<b>Games Played</b>	<b>Platform Goals per Game</b>	<b>Platform Points per Game</b>	<b>Career Goals per Game</b>	<b>Career Points per Game</b>	<b>Platform Time on Ice per Game</b>	<b>Rank in Forwards' Time on Ice per Game</b>
<b>Lars Eller</b>	77	0.16	0.34	0.16	0.36	15:57	6th
<b>Dwight King</b>	77	0.19	0.39	0.15	0.34	15:02	7th
<b>Nick Spaling</b>	71	0.18	0.45	0.13	0.28	16:01	5th

On the defensive side, Mr. Eller does exceed Mr. King and Mr. Spaling in blocked shots and hits. However, looking at plus minus Mr. Eller again falls short. While Mr. King and Mr. Spaling were both positive players in their platform year and both recorded the third highest rating amongst forwards on their team, Mr. Eller was a -15, making him worst on his team.

**Platform Year Defensive Statistics of Mr. Eller, Mr. King and Mr. Spaling**

	<b>Platform Plus Minus</b>	<b>Rank in Forwards' Plus Minus</b>	<b>Blocked Shots</b>	<b>Hits</b>	<b>Takeaways</b>	<b>Shorthanded Time on Ice per Game (rank amongst forwards)</b>
<b>Lars Eller</b>	-15	13th (of 13)	58	130	30	1:24 (6th)
<b>Dwight King</b>	+16	3rd (of 11)	17	114	15	1:16 (6th)
<b>Nick Spaling</b>	+2	3rd (of 12)	32	42	30	1:31 (4th)

**Conclusion: Mr Eller should be awarded \$2.75 million**

As outlined in this brief, based on his production in his platform year, Mr. Eller has only shown that he performs well enough at the offensive or defensive aspects of the game to be the third line centre for the Montreal Canadiens. In comparison with relevant comparable players, Mr. Eller's production exceeds those who make around \$2.0 million per season but he falls short of the production of Michael Frolik and Josh Bailey who make \$3.3 million. As such Mr. Eller should be awarded less than the \$3.5 million midpoint salary. We submit that Lars Eller should be awarded \$2.75 million.